

Presentment Date: June 13, 2023

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:	) PROMESA
THE FINANCIAL OVERSIGHT AND	) Title III
MANAGEMENT BOARD FOR PUERTO RICO,	)
	) No. 17 BK 3283-LTS
as representative of	)
THE COMMONWEALTH OF PUERTO RICO,	) (Jointly Administered)
<i>et al.</i>	)
	)
Debtors.	)
	)
	) PROMESA
In re:	) Title III
	)
THE FINANCIAL OVERSIGHT AND	) No. 17 BK 4780-LTS
MANAGEMENT BOARD FOR PUERTO RICO,	)
	)
as representative of	)
PUERTO RICO ELECTRIC POWER	)
AUTHORITY (“PREPA”)	)
	)
Debtor. <sup>1</sup>	)
	)
	)

**NOTICE OF PRESENTMENT OF PROPOSED ORDER  
REGARDING COBRA ACQUISITIONS LLC’S MOTION TO MODIFY STAY ORDER**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**PLEASE TAKE NOTICE** that Cobra Acquisitions LLC (“Cobra”) hereby submits this *Notice of Presentment of Proposed Order Regarding Cobra Acquisitions LLC’s Motion to Modify Stay Order*.

**PLEASE TAKE FURTHER NOTICE** that, on May 16, 2023, Cobra filed *Cobra Acquisitions LLC’s Motion to Modify Stay Order* [Case No. 17-BK-3283, ECF No. 24219; Case No. 17-BK-4870, ECF No. 3507] (the “Motion”).<sup>1</sup>

**PLEASE TAKE FURTHER NOTICE** that, on May 23, 2023, the Government Parties filed the *Joint Objection of the Financial Oversight and Management Board for Puerto Rico, Puerto Rico Electric Power Authority, and Puerto Rico Fiscal Agency and Financial Advisory Authority to Cobra Acquisitions LLC’s Motion to Modify Stay Order* [Case No. 17-BK-3283, ECF No. 24301; Case No. 17-BK-4780, ECF No. 3541].

**PLEASE TAKE FURTHER NOTICE** that, on May 30, 2023, Cobra filed its *Reply in Support of Motion to Modify Stay Order* [Case No. 17-BK-3283, ECF No. 24363].

**PLEASE TAKE FURTHER NOTICE** that, on June 8, 2023, the United States District Court for the District of Puerto Rico (the “Court”) held a hearing on the Motion (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit A**, is a proposed order (the “Proposed Order”) regarding the Motion in accordance with the Court’s ruling at the Hearing.

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<sup>1</sup> Unless otherwise specified, capitalized terms have the same meaning as in the Motion.

Dated: June 12, 2023

Respectfully submitted,

/s/ Carlos R. Rivera-Ortiz

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*Attorneys for Cobra Acquisitions LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this date he electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

/s/ Carlos R. Rivera-Ortiz

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